



State of New Jersey

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December 8, 2009

Patricia Simmons Pierre
United States Environmental Protection Agency
Region 2
290 Broadway
New York NY 10007-1866

Re: Addendum to the Remedial Action Work Plan for Source Reduction
L E Carpenter
170 North Main St
Wharton, Morris County
SRP PI# 003017
Activity Number Reference: RPC060001

Dear Ms. Pierre:

The New Jersey Department of Environmental Protection (Department) has completed review of the Remedial Investigation Work Plan dated September 3, 2009, submitted pursuant to CERCLA and the Technical Requirements for Site Remediation at N.J.A.C. 7:26E (Tech Rules).

The Department's comments on the submittal are provided below.

Comments

MW-19 Hot Spot-1 Area.

The responsible party (RP) proposes to demolish an existing building, under which residual BTEX contamination is present, and excavate and remove contaminated soil and residual product. This is *acceptable* to the Department.

The RP must continue ground water monitoring, as required by the *Technical Requirements for Site Remediation (TRSR)*, to verify the effectiveness of this remedy. The Department expects a temporary increase in contaminant levels as contaminants are released/mobilized by the excavation and removal action.

MW-30 Area.

7:26-6.3(a) - Failure to contain contaminants as a first priority, or to prevent contaminant exposure to receptors and to prevent further movement of contaminants through any pathway. Contaminant levels

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in MW30S significantly exceed the GWQS and are higher than those before source removal (excavation). These contaminants discharge to the ditch that borders the site and empties into the Rockaway River.

Very high levels of site related contaminants are documented in the wetlands east of the central source excavated/remediated area, suggestive of free phase product. The RP proposes to delineate the product using the *TarGOST* at 15 locations and install one additional well (MW-36s). Additionally, the work plan indicates "stepping out" from the proposed locations may be necessary to complete delineation.

This proposal is *conditionally acceptable* to the Department. Review of the proposed locations indicates too few locations to accomplish this task. The Department requires several more locations between TG-07 and TG-10; TG-10 and TG-12; TG-12 and TG-04.

The primary method proposed for contaminant detection is the Tar-specific Green Optical Screening Tool with a Geoprobe. The data collection objective for the remaining sources is to determine the extent of residual BTEX and DEHP LNAPL for ultimate remediation decisions. The use of the technology for this purpose is acceptable; however the appropriate number of confirmatory lab samples must be collected to verify the results of the field screening. The NAPL screening tool does not provide any indication of the actual contaminant levels in soil and groundwater, since no lower detection limit is specified for the technology. The final delineation of contamination at the MW-30 Area must be completed using traditional soil and groundwater collection methods and the results compared to the Site Remediation Standards. (Refer to; <http://www.state.nj.us/dep/srp/regs/rs/>).

The RP does not propose to delineate *dissolved* ground water contamination that is possibly being released by the product. Previously a *Notice of Deficiency (NOD)* was issued to the RP regarding this requirement in the Department's review of *Remedial Investigation Work Plan (August 2008)*.

As required by the *Technical Requirements for Site Remediation (TRSR)*, product must be removed, destroyed in place or controlled so no product or dissolved contamination discharges to the adjacent surface waters. Additionally, the *TRSR* requires complete delineation of dissolved ground water contamination, horizontally and vertically, to the applicable GWQS.

MW-28 Cluster Area.

Site related contaminants of concern are documented in the MW-28 cluster. This is in the remediated central source area. The RP previously stated contaminants are not migrating downward. However, this is contradicted by sampling data. DEHP is present at 200 ppb in MW-28s and 240ppb in MW-28i. The GQWS for this compound is 3 ppb.

The Department previously required the RP continue monitoring in these wells, believing contaminant levels would attenuate after mobilized contaminants, due to the removal activities, dissipated. However, sampling results suggest attenuation is not occurring to a significant degree. Accordingly, the RP must submit a proposal to delineate ground water contamination, horizontally and vertically to the appropriate GWQS, in the area of this cluster. Depending on the results of this effort, the Department may require additional remediation.

Surface Water Sampling.

7:26E-4.4(h)3vii- Failure to properly evaluate any surface water body potentially impacted by contaminated groundwater. Incorrect Surface Water Quality Standards and Classification were applied in evaluating impacts to surface water bordering the site.

The Department previously commented on the location of the background surface water sampling location (SW-R6) is not optimal, and recommended another more representative location be chosen. However, the RP did not respond to this recommendation. Accordingly, the Department is requiring a location, just downstream of the dam, as the background surface water sampling location.

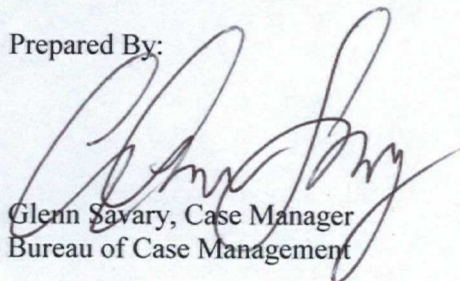
The Department previously commented the surface water detection limits were increased by 5X-10X and that this was unacceptable. The RP responded in the *Remedial Investigation Work Plan (August 2008)*, that this was due to lab changes and the original, much lower, detection limits would be restored for future sampling events. However, surface water has been sampled at least once, maybe twice, since the RP agreed to restore the original detection limits. However, samples were not analyzed using the lower detection limits. Accordingly, should future surface water sampling be analyzed with the higher detection limits, the Department will reject the results, and require re-sampling and analysis with the lower detection limits.

The correct surface water classification for the Rockaway River adjacent to the site is **FW2-TM(C1)**. A typo indicated it was FW2-NT(C1).

Please incorporate these comments into the letter that the USEPA will be sending to LE Carpenter.

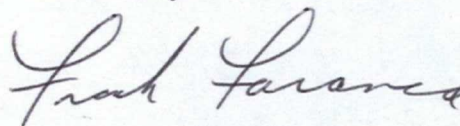
If you have any questions regarding this matter contact Glenn Savary Case Manager, at (609) 633-0835, or at glenn.savary@dep.state.nj.us.

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